

REPORTS ANALYSIS REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 24, 2009

ANALYST: Eric Fusselle

- I. COMMITTEE: Committee to Re-Elect Ed Towns  
C00197285  
Albert C. Wiltshire, Treasurer  
438 Lewis Avenue  
Brooklyn, NY 11233
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)  
11 CFR §104.3(a)(3)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

The Committee to Re-Elect Ed Towns ("the Committee") amended its 2008 12 Day Pre-Primary Report, covering the period of July 1, 2008 through August 20, 2008, to disclose additional receipts totaling \$111,705.03 which were not included in the original 2008 12 Day Pre-Primary Report (Attachment 2).

On August 28, 2008, the Committee filed its original 2008 12 Day Pre-Primary Report, covering from July 1, 2008 through August 20, 2008, disclosing receipts totaling \$162,554.80 on Line 11(a)(i) (Itemized Contributions from Individuals), \$3,301.01 on Line 11(a)(ii) (Unitemized Contributions from Individuals), and \$80,550.00 on Line 11(c) (Contributions from Other Political Committees) (Image 28991954216).

On December 4, 2008, the Committee filed its Amended 2008 12 Day Pre-Primary Report, covering from July 1, 2008 through August 20, 2008, disclosing additional receipts totaling \$188,297.80 on Line 11(a)(i), \$4,613.04 on Line 11(a)(ii) and \$165,200.00 on Line 11(c) (Image 28993558170).

On January 6, 2009, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2008 12 Day Pre-Primary Report, received 12/4/08. The

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RFAI requested further clarification regarding the substantial increase in the amount of receipts which were not disclosed in the original filing (Image 29039971994).

On February 6, 2009, the Committee filed a Miscellaneous Electronic Submission (Form 99) in regards to the amended 12 Day Pre-Primary report, which stated in part: "Upon review, it appears that the bank deposit slips were not recorded in the internal ledger by the assistant to the Treasurer, which in turn resulted in the fact that I was unaware of the receipts at the time of preparation of the initial report" (Image 29932143563).

On April 2, 2009, the Reports Analysis Division (RAD) Analyst left a voice message about this issue with the Committee's treasurer, Albert Wiltshire (Attachment 3).

On April 3, 2009, Mr. Wiltshire called the RAD Analyst to inform him that the Committee had nothing new to add to the public record regarding the increase in receipts, and to apologize for the situation (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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